



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2398  
DATE FILMED 10/21/87 CAMERA NO. 3  
CAMERAMAN AS

87040360390

PUBLIC RECORD INDEX  
MUR 2398

1. Memo, 17 May 87, John D. Gibson (Reports Analysis Division) to Lawrence M. Noble (Acting General Counsel), Subj: Referral of Minnesota Federation of Teachers Political Fund (Federal) Voluntary.
- 1a. First General Counsel's Report, 20 Apr 87.
- 1b. Certification of Commission Vote, dtd 23 Apr 87.
2. Ltr, 4 May 87, Scott E. Thomas (Chairman FEC) to Louis Sundin (Treasurer, Minnesota Federation of Teachers Political Fund (Federal) Voluntary), w/encl. (Factual and Legal Analysis).
3. Designation of Counsel statement, 21 May 87, Roger A. Peterson named counsel for Louis Sundin
4. Ltr. 19 May 87, Louis A. Sundin to FEC, w/encls.
5. General Counsel's Report, 23 Jun 87
6. Certification of Commission Action, 26 Jun 87
7. Ltr, 1 Jul 87, Lawrence M. Noble to Roger A. Peterson.
8. General Counsels Report, 10 Aug 87.
9. Certification of Commission Action, 13 Au 87.
10. Ltr, 17 Aug 87, L.M. Noble to Roger A Peterson, w/encl. (Executed Conciliation Agreement)

NOTE: In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

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## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 17, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE  
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: 30 DAY POST-GENERAL REPORT NON-FILER REFERRALS OF  
UNAUTHORIZED COMMITTEES

Attached is a listing of fifteen (15) unauthorized committees which failed to file the 1986 30 Day Post-General Report within thirty (30) days of the date of the Non-Filer Notice. In accordance with Standard 3 of the 1985-1986 RAD Review and Referral Procedures for Unauthorized Committees, further examination is required by your office.

On September 29, 1986, prior notification was sent to all unauthorized committees informing them that all committees, regardless of election activity, must file the 30 Day Post-General Report by December 4, 1986 (Attachment 16). Each committee which failed to submit a report covering the post-election reporting period was sent a Non-Filer Notice on December 23, 1986 (Attachment 17).

The attached printout lists the name, address and treasurer for each committee being referred. Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of late-filed reports and/or letters of explanation are included under Reports Filed/Response(s). In addition, a "C" index accompanies each committee. In a few instances, the aggregate receipt and disbursement figures may be inflated because reports were submitted covering portions of the same reporting period.

If you have any questions, please contact Lisa J. Stolaruk at 376-2480.

Attachments

8704060382

**MINNESOTA FEDERATION OF TEACHERS POLITICAL FUND  
(FEDERAL) VOLUNTARY**

(Attachments 8a - 8d)

87040560383

1

FEDERAL ELECTION COMMISSION  
1985-1986  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 16MAR87

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
MINNESOTA FEDERATION OF TEACHERS POLITICAL FUND (FEDERAL) VOLUNTARY CONNECTED ORGANIZATION: TEACHERS; AMERICAN FED'N OF				ID #C00030601	NON-PARTY QUALIFIED	
1985	STATEMENT OF ORGANIZATION - AMENDMENT			26APR85	2	85FEC/372/1548
	STATEMENT OF ORGANIZATION - AMENDMENT			26JUN85	2	85FEC/376/5111
	JULY QUARTERLY	24,596	27,707	1JAN85 -30JUN85	5	85FEC/384/3660
	YEAR-END	3,984	250	1JUL85 -31DEC85	5	86FEC/399/1742
1986	APRIL QUARTERLY	32,983	20,000	1JAN86 -31MAR86	5	86FEC/410/2653
	APRIL QUARTERLY - AMENDMENT	28,645	20,000	1JAN86 -31MAR86	4	86FEC/415/3190
	1'ST LETTER INFORMATIONAL NOTICE			1JAN86 -31MAR86	1	86FEC/424/5209
	JULY QUARTERLY	5,116	10,005	1APR86 -30JUN86	4	86FEC/422/0228
	OCTOBER QUARTERLY	331	10,007	1JUL86 -15OCT86	4	86FEC/443/1135
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1175
	YEAR-END	10,342	35	31OCT86 -31DEC86	3	87FEC/458/5425
	1'ST LETTER INFORMATIONAL NOTICE			31OCT86 -31DEC86	1	87FEC/462/2101
1987	MISCELLANEOUS NOTICE FROM FEC			23JAN87	1	87FEC/455/2912
	TOTAL	73,014	0		38	TOTAL PAGES

All reports have been reviewed.

Debts and Obligations owed to or by the Committee: \$0

Ending Cash-on-Hand as 12/31/86: \$11,059

TELECON

**ANALYST:** Ivonne Cotto

**CONVERSATION WITH:** Janie Hemmelgarn, Secretary

**COMMITTEE:** Minnesota Federation of Teachers Political Fund (Federal)  
Voluntary

**DATE:** 12/29/86

**SUBJECT(S):** Non/Late Filing of Reports

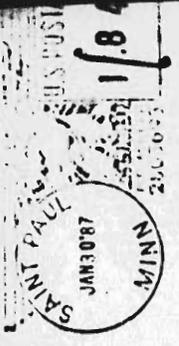
Ms. Janie Hemmelgarn contacted the Reports Analysis Division ("RAD") analyst in reference to the late filing of the 30 Day Post-General Report. Ms. Hemmelgarn stated that she did not know a 30 Day Post-General Report had to be filed. Ms. Hemmelgarn further stated that she will mail a Year End Report covering the period of the 30 Day Post-General Report.

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87 FEB 3 P12:

Attachment 8d



OUR TEACHERS  
MOLD OUR  
NATION'S FUTURE

# FIRST CLASS MAIL

8 7 0 4 0 3 6 0  
8 7 0 3 4 5 8 5 4 2 7

**Minnesota Federation of Teachers**

168 Aurora Ave.  
ST. PAUL, MINNESOTA 55103-2389  
ADDRESS CORRECTION REQUESTED

<p><b>FROM</b></p> <p>MINNESOTA FEDERATION OF TEACHERS 175 Aurora Avenue St. Paul, Minnesota 55103</p>	<p><b>TO</b></p> <p>Public Records Division Federal Election Commission 999 E Street, N.W. Washington, DC 20463</p>	<p><b>PARCEL POST</b></p> <p>CONTENTS: MERCHANDISE RETURN REQUESTED</p>
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**CERTIFIED**  
P 669 299 606  
MAIL

**SENSITIVE**

**FEDERAL ELECTION COMMISSION  
FIRST GENERAL COUNSEL'S REPORT**

**RAD Referrals 87NF-61  
through 87NF-76  
STAFF: A. Weissenborn**

87  
NF  
61  
76  
57

C  
S

**SOURCE OF MUR: INTERNALLY GENERATED  
RESPONDENTS':**

**Minnesota Federation of Teachers Political Fund  
(Federal) Voluntary and Louise Sundin, as  
treasurer;**

87040660388

**RELEVANT STATUTE:** 2 U.S.C. § 434(a)(4)(A)(iii)  
**INTERNAL REPORTS  
CHECKED:** Public Records  
**FEDERAL AGENCIES  
CHECKED:** None

1a

**I. GENERATION OF MATTER**

On March 17, 1987, the Reports Analysis Division ("RAD") referred the following 15 unauthorized political committees to the Office of the General Counsel for failure to file the 1986 Post-General Election Report timely:<sup>1/</sup>

**II. FACTUAL AND LEGAL ANALYSIS**

(A) The Facts

On September 29, 1986, notification was sent to all unauthorized political committee advising that regardless of

---

<sup>1/</sup> The 1986 Post-General Election Report must disclose all financial activity from the close of books of the last report, or the date of registration (whichever is later), through November 24, 1986.

<sup>2/</sup> The fifteen committees discussed in this report were referred to this Office as a group by the Reports Analysis Division. Each referral in which the Commission decides to open a MUR will be assigned a separate MUR number and handled by the staff person indicated in the attached notification letters.

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8. Minnesota Federation of Teachers Political Fund  
(Federal) Voluntary

On January 30, 1987, the 1986 Year-End Report was  
filed. The report covered only a portion of the period required

1a

to be disclosed on the 1986 Post-General Election Report (October 31, 1986, through November 24, 1986) as well as the period required to be disclosed on the 1986 Year-End Report.<sup>3/</sup> Thus, a portion of the information required to be disclosed on the 1986 Post-General Election Report was submitted 57 days late and there may be remaining information not yet disclosed. The 1986 Year-End Report disclosed receipts of \$10,342 and disbursements of \$35.

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<sup>3/</sup> This Committee's 1986 October Quarterly Report covered the period of July 1, 1986, through October 15, 1986. Activity occurring during the period of October 16, 1986, through October 30, 1986, had not been reported as of March 16, 1987.

1a

**(B) The Applicable Law**

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than the authorized committees of a candidate shall file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

**(C) Application of the Law to the Facts**

The record in this matter demonstrates that the 15 political committees discussed on pages 3 - 7 above were required to file the 1986 Post-General Election Report by December 4, 1986. The above committees, however, failed to file the report in a timely manner. In consideration of this circumstance it is the recommendation of this office that the Commission open a Matter Under Review and find reason to believe that a violation of 2 U.S.C. § 434(a)(4)(A)(iii) occurred with respect to the late filing of the 1986 Post-General Election Report by:

Minnesota Federation of Teachers Political Fund  
(Federal) Voluntary and Louise Sundin, as treasurer;

87040660392

1a

**III. RECOMMENDATIONS**

1. Open Matters Under Review with respect to each of the following:

a)

b)

c)

d)

e)

f)

g) Minnesota Federation of Teachers Political Fund  
(Federal) Voluntary and Louise Sundin, as treasurer

h)

i)

j)

k)

l)

m)

2.

3. Open a Matter Under Review with respect to Republic Media Group and Michael Mercier, as treasurer, find reason to believe this committee and treasurer violated 2 U.S.C. § 434(a)(4)(A)(iii), and merge with MUR 2329.

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1a

4.

5. Approve the attached letters and Factual and Legal Analyses.

Date

4/20/87

*Lawrence M. Noble*  
Lawrence M. Noble  
Acting General Counsel

Attachments

1. RAD Referral
2. Letters (14) and Analyses (14)

87040660394

12

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

RAD Ref. 87NF-61  
through 87NF-75

Minnesota Federation of Teachers Political Fund  
(Federal) Voluntary and Louise Sundin, as  
treasurer;

87040660395

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 23, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87NF-61 through 87NF-75:

(continued)

16

1. Open Matters Under Review with respect to each  
of the following:

a)

b)

c)

d)

e)

f)

g) Minnesota Federation of Teachers Political  
Fund (Federal) Voluntary and Louise Sundin,  
as treasurer.

h)

i)

j)

k)

l)

m)

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16

Federal Election Commission  
Certification for RAD Ref. 87NF-61  
through 87NF-75  
April 23, 1987

Page 3

2. Find reason to believe those political committees and individuals listed above violated 2 U.S.C. § 434(a)(4)(A)(iii).

3.

4.

5. Approve the letters and Factual and Legal Analyses, as recommended in the First General Counsel's Report signed April 20, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

4-23-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Mon., 4-20-87, 4:57  
Circulated on 48 hour tally basis: Tues., 4-21-87, 11:00  
Deadline for vote: Thurs., 4-23-87, 11:00

/jm/

16

8704036039Z



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

*Plum*  
*2/2/87*

May 4, 1987

Louise Sundin, Treasurer  
Minnesota Federation of Teachers  
Political Fund (Federal) Voluntary  
168 Aurora Avenue  
St. Paul, MN 55103

Re: MUR 2398  
Minnesota Federation of  
Teachers Political Fund  
(Federal) Voluntary; Louise  
Sundin, as treasurer

Dear Ms. Sundin:

On April 23, 1987, the Federal Election Commission found that there is reason to believe the Minnesota Federation of Teachers Political Fund (Federal) Voluntary ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

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Letter to Louise Sundin  
Page 2

pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Sandra Robinson, at (202) 376-8200.

Sincerely,



Scott E. Thomas  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Minnesota Federation of Teachers MUR 2398  
Political Fund (Federal) Voluntary  
and Louise Sundin, as treasurer

On September 29, 1986, notification was sent to all unauthorized political committees advising that regardless of election activity, the 1986 Post-General Election Report was required to be filed by December 4, 1986. The 1986 Post-General Report is required to disclose all financial activity from the close of books of the last report, or the date of registration (whichever is later), through November 24, 1986. Each political committee which failed to submit a report covering the post-general election reporting period was sent a Non-Filer Notice on December 23, 1986.

On January 30, 1987, the 1986 Year-End Report was filed. The report covered only a portion of the period required to be disclosed on the 1986 Post-General Election Report (October 31, 1986, through November 24, 1986) as well as the period required to be disclosed on the 1986 Year-End Report. Thus, a portion of the information required to be disclosed on the 1986 Post-General Election Report was submitted 57 days late and there may be remaining information not yet disclosed. The 1986 Year-End Report disclosed receipts of \$10,342 and disbursements of \$35. The 1986 October Quarterly Report covered the period of July 1, 1986, through October 15, 1986. Activity occurring during the period of October 16, 1986, through October 30, 1986, had not been reported as of March 16, 1987.

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*Handwritten initials*

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than the authorized committees of a candidate shall file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

The record in this matter demonstrates that respondents were required to file the 1986 Post-General Election Report by December 4, 1986. The respondents, however, failed to file the report in a timely manner. In consideration of this circumstance it is the recommendation of the Office of the General Counsel that the Commission find reason to believe Minnesota Federation of Teachers Political Fund (Federal) Voluntary and Louise Sundin, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2398

NAME OF COUNSEL: Roger A Peterson

ADDRESS: 200-Title Ins Bldg.  
Mpls, Mn 55401

TELEPHONE: 612-335-6743

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

5/21/87  
Date

Louie A. Sander  
Signature

RESPONDENT'S NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: \_\_\_\_\_

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COO# 3435



# Minnesota Federation of Teachers

168 AURORA AVENUE SAINT PAUL, MINNESOTA 55103  
612/227-8583

97 MAY 26 P 2: 58

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

May 19, 1987

Scott E. Thomas, Chairman  
c/o Sandra Robinson  
Office of the General Counsel  
Federal Election Commission  
Washington, DC 20463

RE: MUR 2398

Dear Mr. Thomas:

As treasurer of the Minnesota Federation of Teachers Political Fund (Federal) Voluntary, this letter is to request pre-probable cause conciliation regarding MUR 2398.

Please see the enclosed letter from Janie Hemmelgarn, MFT Secretary for an explanation.

Sincerely,

Louise A. Sundin, Treasurer  
MFT Political Fund (Federal) Voluntary  
Identification Number: C00030601

/jh  
opeiu#12  
afl/cio

37040560403

97 MAY 26 P 5: 16

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

4



# Minnesota Federation of Teachers

168 AURORA AVENUE  
612/227-8583

SAINT PAUL, MINNESOTA 55103

May 19, 1987

Scott E. Thomas, Chairman  
c/o Sandra Robinson  
Office of the General Counsel  
Federal Election Commission  
Washington, DC 20463

RE: MUR 2398

Dear Mr. Thomas:

This letter is to request pre-probable cause conciliation. The following is an explanation and series of events which we feel were extenuating circumstances and would like to assure the Commission that it is our intent to comply with the Federal Election Commission guidelines in the future.

We had a change of treasurers and the FEC was notified of the fact in December 1985. It took a few months to get the mailings from the FEC correct because some notices were sent to the treasurer's home address and not the MFT office. Also, I, the secretary who files the FEC reports for this committee, was on maternity leave from May 10 through September 20, 1986. The September 29, 1986, notice and report form for the 30 Day Post-General report was never received by our office or by Treasurer Louise Sundin.

We received FEC letter dated December 23, 1986, regarding the 30 Day Post-General report which was due December 4, 1986. I called and talked to Ivonne Cotto and explained we didn't receive the forms. The year-end report was due January 31, 1987. Ivonne Cotto told me to file one report to cover both the 30 Day Post-General and the Year-End report, together with a letter of explanation. The report was filed and dated January 30 1987.

We received FEC letter dated January 23, 1987, stating the 1986 October Quarterly report was filed late and the 1986 30 Day Post-General report wasn't filed (Two violations to date). On January 30, 1987, I filed the report which included all monies from October 16, 1986, through December 31, 1986. I made a typographical error in the covering period. I typed October 31, 1986, and should have typed October 16, 1986. On the report I filed, I marked in #4 of the report form that this report was for both the January 31 Year-End report and the 30 Day report; but, I forgot to enclose a letter of explanation that Ivonne had requested. Ivonne does have a telecord of our conversation regarding this matter and I understand she gave you a copy of such telecord.

About March 17 I received FEC letter stating there was a gap in the coverage dates for our reports and an amended report is necessary to disclose the activity from 10/16/86 through 12/31/86. I called Ivonne Cotto, explained that I had made a typographical error, amended the report and sent a copy of the amendment with a written explanation to the FEC. The FEC received the amended report on March 23, 1987.

-more-

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May 19, 1987  
Mr. Scott E. Thomas  
Page Two

Again, I would like to assure the Commission that we feel everything is back under control, and it was never our intention to violate Commission regulations. Thank you for your attention to this matter. Please advise us as soon as possible as to your decision.

Sincerely,

*Janie Hemmelgarn*

Janie Hemmelgarn  
MFT Secretary

/jh  
opeiu#12  
afl/cio

Enclosures: 30 Day Post-General and  
Year-End report, plus  
amendment

87040560405



**MINNESOTA  
FEDERATION OF TEACHERS**

168 AURORA AVENUE SAINT PAUL, MINNESOTA 55103  
(612) 227-8883 OR 1-800-665-9710

1 MAR 23 AS

3/18/87

Ivonne Cotto

Enclosed please find the amended first page of our last report. When I typed out the report, I typed October 31, 1986 and should have typed October 16, 1986. Sorry for any inconvenience this has caused you.

Thank you.

Janie Hemmelgarn  
MFT Secretary

opeiu#12  
af1/cio

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MAR 23 09:04



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20541

RQ-5

6

Louise A. Sundin, Treasurer  
Minnesota Federation of Teachers  
Political Fund (Federal) Voluntary  
168 Aurora Avenue  
St. Paul, MN 55103

Identification Number: C00030601

Reference: Year End Report (10/31/86-12/31/86)

Dear Mr. Sundin:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-There should not be a gap in the coverage dates for your reports. An amended Year End Report is necessary to disclose the activity from 10/16/86 through 12/31/86.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Ivonne Cotto  
Reports Analyst  
Reports Analysis Division

87040660403

4

**REPORT OF RECEIPTS AND DISBURSEMENTS**

Political Committee Other Than an Authorized Committee

(Summary Page)

<p><b>1 Name of Committee (in Full)</b> Minnesota Federation of Teachers Political Fund (Federal) Voluntary</p> <hr/> <p><b>Address (Number and Street)</b> 168 Aurora Avenue</p> <hr/> <p><b>City, State and ZIP Code</b> St. Paul, MN 55103</p> <hr/> <p><input type="checkbox"/> Check here if address is different than previously reported.</p>	<p><b>4. TYPE OF REPORT (Check appropriate boxes)</b></p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report      <input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report      <input checked="" type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)</p> <p>election on _____ in the State of _____</p> <p><input checked="" type="checkbox"/> Thirtieth day report following the General Election on <u>Nov. 7, 1986</u> in the State of <u>Minnesota</u></p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES      <input checked="" type="checkbox"/> NO</p>
<p><b>2. FEC Identification Number</b> C00030601</p>	
<p><b>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</b></p>	

87040560409

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
<b>5. Covering Period</b> <u>October 31, 1986</u> through <u>December 31, 1986</u>			
<b>6. (a) Cash on hand January 1, 1986</b> _____			\$ 6,671.53
<b>(b) Cash on Hand at Beginning of Reporting Period</b> _____	\$ 752.32		
<b>(c) Total Receipts (from Line 18)</b> _____	\$ 10,342.09	\$ 44,435.83	
<b>(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)</b> _____	\$ 11,094.41	\$ 51,107.36	
<b>7. Total Disbursements (from Line 28)</b> _____	\$ 35.00	\$ 40,047.95	
<b>8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))</b> _____	\$ 11,059.41	\$ 11,059.41	
<b>9. Debts and Obligations Owed TO The Committee (itemize all on Schedule C or Schedule D)</b> _____	\$ _____		
<b>10. Debts and Obligations Owed BY the Committee (itemize all on schedule C or Schedule D)</b> _____	\$ _____		

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

**Louise A. Sundin**  
\_\_\_\_\_  
Signature of Reporting Person  
*Louise A. Sundin*  
\_\_\_\_\_  
SIGNATURE OF TREASURER

1/30/87  
\_\_\_\_\_  
Date

For further information contact:  
Federal Election Commission  
399 E Street, N.W.  
Washington, D.C. 20463  
Toll Free 800-424-9530  
Local 202-376-3120

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 18 U.S.C. § 43.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

			FEC FORM 3X (8/81)
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TEACHERS POLITICAL FUND (Federal) Voluntary

From Oct. 31, '86 To Dec. 31, '86

COLUMN A Total This Period COLUMN B Calendar Year-To-Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitized \$ \_\_\_\_\_)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

Table with 2 columns: COLUMN A Total This Period, COLUMN B Calendar Year-To-Date. Row 11(a) shows \$10,342.09 and \$44,435.83. Row 11(d) shows \$10,342.09 and \$44,435.83.

11(a) 11(b) 11(c) 11(d)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES

AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

Table with 2 columns: COLUMN A Total This Period, COLUMN B Calendar Year-To-Date. Row 18 shows \$10,342.09 and \$44,435.83.

12 13 14 15 16 17 18

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES

(2 U.S.C. § 441 a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS (returned check 'TFSWC')

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

Table with 2 columns: COLUMN A Total This Period, COLUMN B Calendar Year-To-Date. Row 19 shows \$7.95. Row 20 shows \$40,000.00. Row 27 shows \$35.00 and \$40.00. Row 28 shows \$35.00 and \$40,047.95.

19 20 21 22 23 24 25 26(a) 26(b) 26(c) 26(d) 27 28

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

Table with 2 columns: COLUMN A Total This Period, COLUMN B Calendar Year-To-Date. Row 29 shows \$10,342.09 and \$44,435.83. Row 31 shows \$10,342.09 and \$44,435.83. Row 32 shows \$7.95. Row 34 shows \$7.95.

29 30 31 32 33 34

87040660410

4

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

87 JUN 23 9 4: 23

In the Matter of	)	
	)	
Minnesota Federation of Teachers	)	MUR 2398
Political Fund (Federal)	)	
Voluntary; Louise A. Sundin,	)	
as treasurer	)	

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On April 23, 1987, the Commission found reason to believe that Minnesota Federation of Teachers Political Fund (Federal) Voluntary and Louise A. Sundin, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) by failing to file the 1986 Post-General Election Report in a timely manner. By letter dated May 19, 1987, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

**II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY**

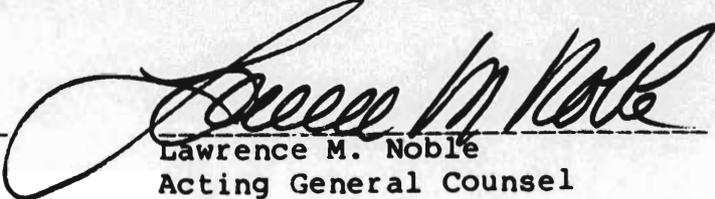
87040560411

**III. RECOMMENDATIONS**

1. Enter into conciliation with Minnesota Federation of Teachers Political Fund (Federal) Voluntary and Louise A. Sundin, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

6/23/87

  
Lawrence M. Noble  
Acting General Counsel

**Attachments**

1. Request for conciliation
2. Proposed agreement and letter

1/ The Committee filed a combined report which included the Year End financial disclosures. All receipts and disbursements were unitemized. The receipts shown were allocated according to the ratio of the number of days in the post-general election reporting period. There was one disbursement undated and indicated as a returned check. It is listed here to show the activity.

87040660412

Attachment(s) 1, 2  
to General Counsel's Report  
have been removed from this  
position in Public Record File.  
See Index Item(s) 4, 7

87040560413

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Minnesota Federation of Teachers	)	MUR 2398
Political Fund (Federal)	)	
Voluntary; Louise A. Sundin,	)	
as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 26, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2398:

1. Enter into conciliation with Minnesota Federation of Teachers Political Fund (Federal) Voluntary and Louise A. Sundin, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed June 23, 1987.

Commissioners Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens did not cast a vote.

Attest:

6/26/87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Tues.,	6-23-87,	4:23
Circulated on 48 hour tally basis:	Wed.,	6-24-87,	11:00
Deadline for vote:	Fri.,	6-26-87,	11:00

87040560414



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 1, 1987

Roger A. Peterson, Esquire  
700 Title Insurance Building  
Minneapolis, Minnesota 55401

RE: MUR 2398  
Minnesota Federation of  
Teachers Political Fund  
(Federal) Voluntary and  
Louise A. Sundin, treasurer

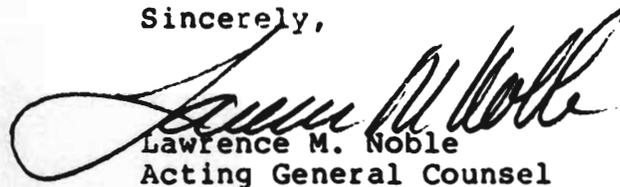
Dear Mr. Peterson:

On April 23, 1987, the Federal Election Commission found reason to believe that your clients, Minnesota Federation of Teachers Political Fund (Federal) Voluntary and Louise A. Sundin, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii). At the request of your clients, on June 26, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

  
Lawrence M. Noble  
Acting General Counsel

Enclosure  
Conciliation Agreement

87040560415

*Handwritten initials*

**SENSITIVE**

7 AUG 10 4:50

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	
Minnesota Federation of Teachers	)	MUR 2398
Political Fund (Federal)	)	
Voluntary	)	
Louise A. Sundin, as treasurer	)	

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

Attached is a conciliation agreement which has been signed by Louise A. Sundin, the treasurer of the Minnesota Federation of Teachers Political Fund (Federal) Voluntary.

**II. RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Minnesota Federation of Teachers Political Fund (Federal) Voluntary and Louise A. Sundin, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date

*8/10/57*

*Lawrence M. Noble*  
 Lawrence M. Noble  
 Acting General Counsel

**Attachments**

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

87040360415

Attachment(s) 1 + 3  
to General Counsel's Report  
have been removed from this  
position in Public Record File.  
See Index Item(s) 10

87040560417

Robinson

17 JUL 27 9 41: 40

Office of the  
Comptroller  
General



MINNESOTA FEDERATION OF TEACHERS  
168 AURORA AVENUE  
SAINT PAUL, MINNESOTA 55103  
(612) 227-8583

17-131  
910

21141

REG. 8/4/87 TO 8-89 250 DOLLARS 00 CTS

DATE	TO THE ORDER OF	CHECK NO.	DESCRIPTION	CHECK AMOUNT
7-14-87	Federal Election Commission	21141	FEC Fine 40215.0	250.00

999 E Street, NW  
Washington, DC 20463

UNION BANK & TRUST  
MINNEAPOLIS, MINNESOTA 55414

*James Pearson*

⑈02114⑈ ⑆091001319⑆ 110156400⑈

CCC 4040

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 21141 (A COPY OF WHICH IS ATTACHED) RELATING TO  
MUR 2398 AND NAME (Federal) Voluntary; Louise A. Sundin, as treasurer  
Minnesota Federation of Teachers Political Fund

WAS RECEIVED ON 7/27/87. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

- /  BUDGET CLEARING ACCOUNT { 95F3875.16 }
- /  CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- /  OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew DATE 7/28/87

Attachment 2

8

87 JUL 27 9 41: 40

Office of the  
Comptroller  
General

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Minnesota Federation of Teachers	)	MUR 2398
Political Fund (Federal)	)	
Voluntary	)	
Louise A. Sundin, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 13, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2398:

1. Accept the conciliation agreement with Minnesota Federation of Teachers Political Fund (Federal) Voluntary and Louise A. Sundin, as treasurer, as recommended in the General Counsel's Report signed August 10, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report signed August 10, 1987.

Commissioners Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens did not cast a vote.

Attest:

8-13-87  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Mon., 8-10-87, 4:50
Circulated on 48 hour tally basis:	Tues., 8-11-87, 11:00
Deadline for vote:	Thurs., 8-13-87, 11:00

87040560419



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 17, 1987

Roger A. Peterson, Esquire  
700 Title Insurance Building  
Minneapolis, Minnesota 55401

RE: MUR 2398  
Minnesota Federation of  
Teachers Political Fund  
(Federal) Voluntary and  
Louise A. Sundin, as  
treasurer

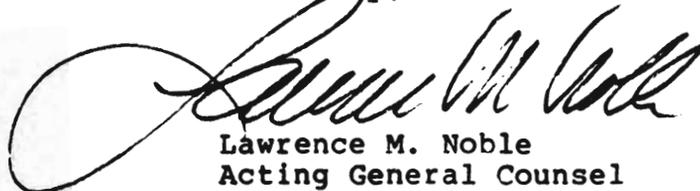
Dear Mr. Peterson:

On August 13, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. 434(a)(4)(A)(iii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Sandra H. Robinson, the attorney assigned to this matter at (202) 376-8200.

Sincerely,



Lawrence M. Noble  
Acting General Counsel

Enclosure  
Conciliation Agreement

87040560420

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 ) MUR 2398  
Minnesota Federation of Teachers )  
Political Fund (Federal) )  
Voluntary; Louise A. Sundin, )  
as treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Minnesota Federation of Teachers Political Fund (Federal) Voluntary and Louise A. Sundin, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent, Minnesota Federation of Teachers Political Fund (Federal) Voluntary, is a political committee

87040560421

within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Louise A. Sundin, is the treasurer of Minnesota Federation of Teachers Political Fund (Federal) Voluntary.

3. Respondents were required to file a 1986 Post-General Election Report covering the period of October 16 through November 24, 1986.

4. The 1986 Post-General Election Report was due on December 4, 1986.

5. Respondents filed a combined 1986 Year End Report covering the period of October 31 through December 31, 1986 on January 30, 1987. Respondents amended said Report on February 3, 1987, correcting a typographical error to show that the report also included the period of October 16 through October 30, 1986.

V. Respondents filed the 1986 Post-General Election Report 57 days late, in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred Fifty dollars (\$250.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

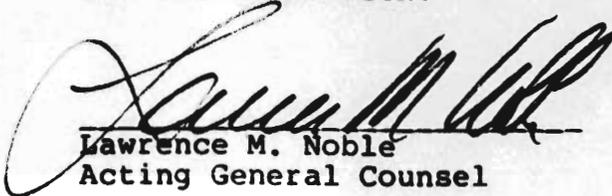
87040560422

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

  
Lawrence M. Noble  
Acting General Counsel

8/17/87  
Date

FOR THE RESPONDENTS:

  
Louise A. Sundin  
Treasurer

7/14/87  
Date

87040560423



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2398

DATE FILMED 10/21/87 CAMERA NO. 3

CAMERAMAN AS

87040560424



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

M12-21-87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2398.

8 3 0 4 0 6 7 0 2 0 6

37 JUL 27 9 4: 40

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL



MINNESOTA FEDERATION OF TEACHERS  
168 AURORA AVENUE  
SAINT PAUL, MINNESOTA 55103  
(612) 227-8583

17-131  
910

21141

REG. 8/4/87 TO 6-89 250 DOLLARS 00 CTS

DATE	TO THE ORDER OF	CHECK NO.	DESCRIPTION	CHECK AMOUNT
7-14-87	Federal Election Commission	21141	FEC Fine 40215.0	250.00

999 E Street, NW  
Washington, DC 20463

UNION BANK & TRUST  
MINNEAPOLIS, MINNESOTA 55414

⑈021141⑈ ⑆091001319⑆110156400⑈

*James Pearson*

CCC 4040

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 21141 { A COPY OF WHICH IS ATTACHED } RELATIVE TO  
 MINR 2398 (Robinson) AND NAME (Federal) Voluntary; Louise A. Sundin, as treasurer

WAS RECEIVED ON 7/27/87. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- /  BUDGET CLEARING ACCOUNT { 953875.16 }
- /  CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- /  OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew DATE 7/28/87

37 JUL 27 9 4: 40

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

RECEIVED AT THE FEC

87 JUL 23 4:59  
REC'D JUL 6 1987



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 1, 1987

Roger A. Peterson, Esquire  
700 Title Insurance Building  
Minneapolis, Minnesota 55401

RE: MUR 2398  
Minnesota Federation of  
Teachers Political Fund  
(Federal) Voluntary and  
Louise A. Sundin, treasurer

Dear Mr. Peterson:

On April 23, 1987, the Federal Election Commission found reason to believe that your clients, Minnesota Federation of Teachers Political Fund (Federal) Voluntary and Louise A. Sundin, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii). At the request of your clients, on June 26, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

*Lawrence M. Noble*  
Lawrence M. Noble  
Acting General Counsel

Enclosure  
Conciliation Agreement

88040570208



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

M12-21-87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2411 .

33040670209

07 JUL 20 P 3: 25

RECEIVED  
GENERAL INVESTMENT



OCEAN SPRAY CRANBERRIES, INC. NO. V 33136

PLYMOUTH, MASSACHUSETTS

53-284  
113

TO FIRST BRISTOL COUNTY NATIONAL BANK  
MASSACHUSETTS

MO.	DAY	YR
7	16	87

PAY  
TO THE ORDER OF

DOLLARS	CENTS
\$750	00

DOLLARS	CENTS
\$750	00

VOUCHER PAYMENT

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

*Robert C. LeBoeuf*  
AUTHORIZED SIGNATURE

⑈0033136⑈⑈011302849⑈ 9148 008⑈

6CC 3967

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 33136 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2411 (Revised) AND NAME Ocean Spray PAC, and Ellen M. Napier, as Treas

WAS RECEIVED ON 7/20/87 PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT { 95F3875.16 }
- CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew

DATE 7/20/87

07 JUL 20 P 1: 28

RECEIVED  
GENERAL INVESTMENT

012010

GCC 3967

RECEIVED AT THE FEC

**HAND DELIVERED**

87 JUL 17 AM 11:41

James S. O'Shaughnessy  
Attorney

July 15, 1987

VIA FEDERAL EXPRESS

Sandra H. Robinson, Esquire  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

37 JUL 20 P 3:20

RECEIVED  
OFFICE OF THE  
COMMISSIONER

Re: MUR 2411, Ocean Spray Political Action Committee

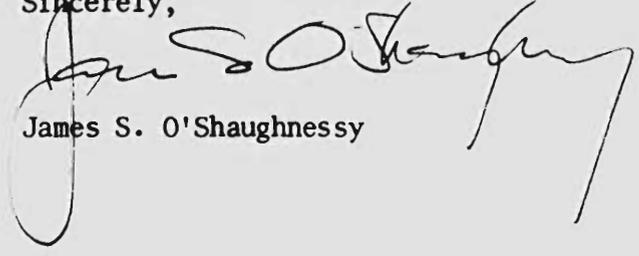
Dear Ms. Robinson:

Pursuant to our telephone discussions, I submit herewith two executed originals of the Conciliation Agreement resolving the above-referenced matter and a check in the amount of \$750. Please have Attorney Noble execute the agreements and return one of them to us for our file.

If the Commission has any further question or comment on this matter, please contact me directly.

Thank you.

Sincerely,



James S. O'Shaughnessy

JSO:ssb  
Enclosures  
5382

1130750606

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Ocean Spray Political Action ) MUR 2411  
Committee and Ellen M. Napier, )  
as Treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Ocean Spray Political Action Committee and Ellen M. Napier, as Treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(ii) and (iii).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of the proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent, Ocean Spray Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Ellen M. Napier, is the Treasurer of Ocean Spray Political Action Committee.

2021 04 06 70212

3. Respondent, Ocean Spray Political Action Committee, made a contribution of (\$1,000) on October 1, 1986, to Citizens for Dave Obey Committee. Dave Obey was a candidate for federal office in the 1986 General Election. Thus, pursuant to 2 U.S.C. §434(a)(4)(A)(ii), Respondents were required to file a 12-Day Pre-Election Report by October 23, 1986. A report covering this period was filed on February 2, 1987, 102 days late.

4. Pursuant to 2 U.S.C. §434(a)(4)(A)(iii), Respondents were required to file the 1986 Post-General Election Report by December 4, 1986. The report was filed on February 2, 1987, 60 days late.

V. Respondents failed to file the 12-Day Pre-Election Report and the 1986 Post-General Election Report in a timely manner in violation of 2 U.S.C. §434(a)(4)(A)(ii) and (iii).

VI. Respondents will pay a total civil penalty to the Federal Election Commission in the amount of Seven Hundred and Fifty Dollars (\$750.00), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

89040670213

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

\_\_\_\_\_  
Lawrence M. Noble  
Acting General Counsel

\_\_\_\_\_  
Date

FOR THE RESPONDENTS:

\_\_\_\_\_  
Ellen M. Napier  
Treasurer

\_\_\_\_\_  
Date July 16, 1987

4  
1  
2  
2  
7  
6  
0  
4  
0  
0  
2  
9